



June 2007

Information Request Questions: Superfund Recycling Equity Act – Scrap – Paper, Plastics and Textiles

1. For the following questions which relate to transactions involving scrap paper, scrap plastic, or scrap textile, provide requested information, and also provide copies of any documents that contain any information that is related to the response:
 - a. List all shipments of scrap paper, scrap plastic, or scrap textile your company sent to the Site. In this list, include the date for each transaction, the type and quantity of scrap material sent, the amount paid or collected in connection with each transaction, the method of payment, and identify the person making or receiving the payment.
 - b. What commercial specification grade did the scrap material listed in your response to question 1(a) meet? List/identify the commercial specification grades that each scrap material identified in 1(a) met.
 - c. Did a market exist for the scrap materials listed in your response to question 1 (a) above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).
 - d. At the time of the transaction(s), what was the intended disposition of the scrap material listed in your response to question 1(a) at the Site?
 - e. After sale, transfer, delivery, or disposal, what portion of the scrap material list in your response to question 1(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.
 - f. Could the scrap material listed in your response to question 1(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.
 - g. Could any products to be made from the scrap material listed in your response to question 1(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.
2. Did your company have a basis for believing that the scrap material listed in your response to question 1(a) would be recycled? If so, what was that basis? Provide supporting documentation.
3. Describe all efforts (i.e., site visits) taken by your company [and/or broker, insert if applicable] to determine what would be done with the scrap material identified in your response to question 1(a) that may have been sold, transferred, or delivered to the Site.
4. What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that [insert name of company and/or broker] receiving the scrap metal listed in your response to question 1(a) was in compliance with applicable Federal environmental regulations or standards, and any amendments with respect to scrap material?

5. Did your company have a basis for believing that the facility at the Site was in compliance with substantive provisions of any Federal, State, or local environmental law or regulation, or compliance order or decree issued applicable to the handling, processing, reclamation, or other management activities associated with these scrap materials listed in your response to question 1(a)? If so, what was that basis? Provide supporting documentation.
6. Describe the efforts your company undertook with respect to the management and handling of the scrap materials listed in your response to question 1(a), including the extent to which you adhered to customary industry practices current at the time of the transaction designed to minimize contamination of these materials by hazardous substances.